

West Virginia Department of Environmental Protection
Division of Air Quality

Joe Manchin, III
Governor

Stephanie R. Timmermeyer
Cabinet Secretary

Permit to Operate



Pursuant to
Title V
of the Clean Air Act

Issued to:
Weyerhaeuser NR Company
Sutton Structurwood Mill
R30-00700016-2007

John A. Benedict
Director

Issued: October 24, 2007 • Effective: November 7, 2007
Expiration: October 24, 2012 • Renewal Application Due: April 24, 2012

Permit Number: **R30-00700016-2007 [\(SM02\)](#) ~~(MM01)~~**
Permittee: **Weyerhaeuser NR Company**
Facility Name: **Sutton Structurwood Mill**
Mailing Address: **HC 65 Box 1A, Heaters, WV 26627**

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 — Requirements for Operating Permits. The permittee identified at the above-referenced facility is authorized to operate the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Facility Location:	Heaters, Braxton County, West Virginia
Mailing Address:	HC 65 Box 1A, Heaters, WV 26627
Telephone Number:	(304) 765-4200
Type of Business Entity:	Corporation
Facility Description:	Manufacturer of oriented strand board (OSB)
SIC Codes:	2493
UTM Coordinates:	529.939 km Easting • 4,290.213 km Northing • Zone 17

Permit Writer: Jesse Hanshaw

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

Issuance of this Title V Operating Permit does not supersede or invalidate any existing permits under 45CSR13, 14 or 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V Operating Permit.

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1.0 Emission Units and Active R13, R14, and R19 Permits

1.1 Emission Units⁽¹⁾

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
1S	1	Flaking and Screening System (consists of 2 flakers, 27 conveyor pickups, 6 green screens, and 1 hog and disk screen)	1996	65,450 ACFM 50 lb/hr (oven dry)	Fabric Filter 4313-00-10
3S	3	Dry Flake Area (consists of 4 dry bins, 17 conveyor pickups, 4 weigh belts, 4 blenders, and 4 forming bins)	1996	53,400 ACFM 3,300 lb/hr (oven dry)	Fabric Filter 4333-00-10
4S	4	Mat Trim System (consists of 2 mat side trim saws, 2 flying end saws, and 6 material collection hoppers)	1996	43,100 ACFM 5,500 lb/hr (oven dry)	Fabric Filter 4345-00-10
5S	5	Rough Trim System (consists of 4 rough trim and hogging heads, material collection screw, and 5 press pit floor sweeps)	1996	21,200 ACFM 5,730 lb/hr (oven dry)	Fabric Filter 4353-00-10
6S	6	Tongue & Groove and Sawing System (consists of 2 four-head T&G systems, 1 two-head T&G machine, finish crosscut {2 hogging heads and 2 saws} and finish ripcut {2 hogging heads and 2 saws})	1996	30,970 ACFM 6,160 lb/hr (oven dry)	Fabric Filter 4363-00-10
7S	7	Sander Dust System (consists of a 6-head wide belt sander)	1996	44,800 ACFM 2,200 lb/hr (oven dry)	Fabric Filter 4374-00-10
9S	9	Dry Waste System (pneumatically relays material through 2 cyclones to the Dry Fuel Silo from systems 3, 4, 5, and 6 to the Sander Dust Silo from system 7)	1996	13,200 ACFM 8,550 lb/hr (oven dry)	Fabric Filter 4397-00-10
3816-00-11	10	Energy Cell No. 1 Auxiliary Burner – Idle Run ⁽²⁾	1996	29 MMBTU/hr	Multi-Clone No.1 3820-00-10
3800-00-10	10	Energy Cell No. 1 - Idle Run ⁽²⁾	1996	<30 MMBTU/hr	Multi-Clone No.1 3820-00-10

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
3816-00-11	21	Energy Cell No. 1 Auxiliary Burner – Normal Run ⁽²⁾	1996	29 MMBTU/hr	Wet ESP No. 1 4110-00-10
3800-00-10	21	Energy Cell No. 1 – Normal Run ⁽²⁾	1996	175 MMBTU/hr	RCO/RTO No. 1 4440-00-10
3916-00-11	11	Energy Cell No. 2 Auxiliary Burner – Idle Run ⁽²⁾	1996	29 MMBTU/hr	Multi-Clone No.2 3920-00-10
3900-00-10	11	Energy Cell No. 2 - Idle Run ⁽²⁾	1996	< 30 MMBTU/hr	Multi-Clone No.2 3920-00-10
3916-00-11	21	Energy Cell No. 2 Auxiliary Burner – Normal Run ⁽²⁾	1996	29 MMBTU/hr	Wet ESP No. 2 4120-00-10
3900-00-10	21	Energy Cell No. 2 – Normal Run ⁽²⁾	1996	175 MMBTU/hr	RCO/RTO No. 2 4460-00-10
3130-00-11	21	Auxiliary Burner – Dryer No. 1	1996	55 MMBTU/hr	Wet ESP No. 1 4110-00-10
3230-00-11	21	Auxiliary Burner – Dryer No. 2	1996	55 MMBTU/hr	RCO/RTO No. 1 4440-00-10
3330-00-11	21	Auxiliary Burner – Dryer No. 3	1996	55 MMBTU/hr	Wet ESP No.2 4120-00-10
3430-00-11	21	Auxiliary Burner – Dryer No. 4	1996	55 MMBTU/hr	RCO/RTO No. 2 4460-00-10
4700-00-10	21	OSB Press Vent Exhaust	1996	60.4 Ton/hr	Wet ESP No. 1 4110-00-10 RCO/RTO No. 1 4440-00-10 Wet ESP No. 2 4120-00-10 RCO/RTO No. 2 4460-00-10
4700-00-10	24	OSB Press Vent Exhaust (Bypass Mode)	1996	60.4 Ton/hr	None
27S	27	Emergency Diesel Generator	1996	760 hp	None
31S	31	Liquid Phenolic Resin Tank No. 1	1996	15,000 Gallons	None
32S	32	Liquid Phenolic Resin Tank No. 2	1996	15,000 Gallons	None
33S	33	Liquid Phenolic Resin Tank No. 3	1996	15,000 Gallons	None
34S	34	Liquid Phenolic Resin Tank No. 4	1996	15,000 Gallons	None
46S	46	Liquid Phenolic Resin Tank No. 5	2005	15,000 Gallons	None
47S	47	Liquid Phenolic Resin Tank No. 6	2005	15,000 Gallons	None
35S	35	MDI Tank No. 1	1996	15,000 Gallons	None

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
36S	36	MDI Tank No. 2	1996	15,000 Gallons	None
37S	37	Wax Tank No. 1	1996	15,000 Gallons	None
38S	38	Wax Tank No. 2	1996	15,000 Gallons	None
8109-00-10	39	Wax/Resin Tank Heater	1996	3.5 MMBTU/hr	None
40S and 41S	40 and 41	Paint Booth No. 1	2002	26 Gal./hr	Filters
42S and 43S	42 and 43	Paint Booth No. 2	2002	26 Gal./hr	Filters
44S and 45S	44 and 45	Paint Booth No. 3	2002	26 Gal./hr	Filters

⁽¹⁾ ESP = Electrostatic Precipitator; RCO = Regenerative Catalytic Oxidizer; RTO = Regenerative Thermal Oxidizer

⁽²⁾ Energy Cells are authorized to operate in the following scenarios: During “normal operations,” gases will be vented through Wet ESPs and RTO/RCO and out Emission Point 21. During RCDME, gases will be vented through Wet ESPs and out Emission Point 21. During “Idle Run Condition,” gases will be vented through Multiclones and out Emission Points 10 and 11. During “Energy Cell Only Mode,” gases will be vented through Wet ESPs and out Emission Point 21.

1.2. Active R13, R14, and R19 Permits

The underlying authority for any conditions from R13, R14, and/or R19 permits contained in this operating permit is cited using the original permit number (e.g. R13-1234). The current applicable version of such permit(s) is listed below.

Permit Number	Date of Issuance
R13-1761G	March 12, 2009

2.0 General Conditions

2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.
- 2.1.4. Unless otherwise specified in a permit condition or underlying rule or regulation, all references to a "rolling yearly total" shall mean the sum of the data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months.

2.2. Acronyms

CAAA	Clean Air Act Amendments	NO_x	Nitrogen Oxides
CBI	Confidential Business Information	NSPS	New Source Performance
CEM	Continuous Emission Monitor		Standards
CES	Certified Emission Statement	PM	Particulate Matter
C.F.R. or CFR	Code of Federal Regulations	PM₁₀	Particulate Matter less than
CO	Carbon Monoxide		10µm in diameter
C.S.R. or CSR	Codes of State Rules	pph	Pounds per Hour
DAQ	Division of Air Quality	ppm	Parts per Million
DEP	Department of Environmental Protection	PSD	Prevention of Significant Deterioration
FOIA	Freedom of Information Act	psi	Pounds per Square Inch
HAP	Hazardous Air Pollutant	SIC	Standard Industrial Classification
HON	Hazardous Organic NESHAP		
HP	Horsepower	SIP	State Implementation Plan
lbs/hr or lb/hr	Pounds per Hour	SO₂	Sulfur Dioxide
LDAR	Leak Detection and Repair	TAP	Toxic Air Pollutant
M	Thousand	TPY	Tons per Year
MACT	Maximum Achievable Control Technology	TRS	Total Reduced Sulfur
		TSP	Total Suspended Particulate
MM	Million	USEPA	United States Environmental Protection Agency
MMBtu/hr or mmbtu/hr	Million British Thermal Units per Hour		
MMCF/hr or mmcf/hr	Million Cubic Feet Burned per Hour	UTM	Universal Transverse Mercator
NA	Not Applicable	VEE	Visual Emissions Evaluation
NAAQS	National Ambient Air Quality Standards	VOC	Volatile Organic Compounds
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		

2.3. Permit Expiration and Renewal

- 2.3.1. Permit duration. This permit is issued for a fixed term of five (5) years and shall expire on the date specified on the cover of this permit, except as provided in 45CSR§30-6.3.b. and 45CSR§30-6.3.c.
[45CSR§30-5.1.b.]
- 2.3.2. A permit renewal application is timely if it is submitted at least six (6) months prior to the date of permit expiration.
[45CSR§30-4.1.a.3.]
- 2.3.3. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with 45CSR§30-6.2. and 45CSR§30-4.1.a.3.
[45CSR§30-6.3.b.]
- 2.3.4. If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time.
[45CSR§30-6.3.c.]

2.4. Permit Actions

- 2.4.1. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[45CSR§30-5.1.f.3.]

2.5. Reopening for Cause

- 2.5.1. This permit shall be reopened and revised under any of the following circumstances:
 - a. Additional applicable requirements under the Clean Air Act or the Secretary's legislative rules become applicable to a major source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 45CSR§§30-6.6.a.1.A. or B.
 - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under Title IV of the Clean Air Act (Acid Deposition Control) or other legislative rules of the Secretary. Upon approval by U.S. EPA, excess emissions offset plans shall be incorporated into the permit.
 - c. The Secretary or U.S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 - d. The Secretary or U.S. EPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.

[45CSR§30-6.6.a.]

2.6. Administrative Permit Amendments

- 2.6.1. The permittee may request an administrative permit amendment as defined in and according to the procedures specified in 45CSR§30-6.4.
[45CSR§30-6.4.]

2.7. Minor Permit Modifications

- 2.7.1. The permittee may request a minor permit modification as defined in and according to the procedures specified in 45CSR§30-6.5.a.
[45CSR§30-6.5.a.]

2.8. Significant Permit Modification

- 2.8.1. The permittee may request a significant permit modification, in accordance with 45CSR§30-6.5.b., for permit modifications that do not qualify for minor permit modifications or as administrative amendments.
[45CSR§30-6.5.b.]

2.9. Emissions Trading

- 2.9.1. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit and that are in accordance with all applicable requirements.
[45CSR§30-5.1.h.]

2.10. Off-Permit Changes

- 2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:
- a. The change must meet all applicable requirements and may not violate any existing permit term or condition.
 - b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
 - c. The change shall not qualify for the permit shield.
 - d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.
 - e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.

- f. No permittee may make any changes which would require preconstruction review under any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) pursuant to the provisions of 45CSR§30-5.9.

[45CSR§30-5.9.]

2.11. Operational Flexibility

- 2.11.1. The permittee may make changes within the facility as provided by § 502(b)(10) of the Clean Air Act. Such operational flexibility shall be provided in the permit in conformance with the permit application and applicable requirements. No such changes shall be a modification under any rule or any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) promulgated by the Secretary in accordance with Title I of the Clean Air Act and the change shall not result in a level of emissions exceeding the emissions allowable under the permit.

[45CSR§30-5.8]

- 2.11.2. Before making a change under 45CSR§30-5.8., the permittee shall provide advance written notice to the Secretary and to U.S. EPA, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The permittee shall thereafter maintain a copy of the notice with the permit, and the Secretary shall place a copy with the permit in the public file. The written notice shall be provided to the Secretary and U.S. EPA at least seven (7) days prior to the date that the change is to be made, except that this period may be shortened or eliminated as necessary for a change that must be implemented more quickly to address unanticipated conditions posing a significant health, safety, or environmental hazard. If less than seven (7) days notice is provided because of a need to respond more quickly to such unanticipated conditions, the permittee shall provide notice to the Secretary and U.S. EPA as soon as possible after learning of the need to make the change.

[45CSR§30-5.8.a.]

- 2.11.3. The permit shield shall not apply to changes made under 45CSR§30-5.8., except those provided for in 45CSR§30-5.8.d. However, the protection of the permit shield will continue to apply to operations and emissions that are not affected by the change, provided that the permittee complies with the terms and conditions of the permit applicable to such operations and emissions. The permit shield may be reinstated for emissions and operations affected by the change:

- a. If subsequent changes cause the facility's operations and emissions to revert to those authorized in the permit and the permittee resumes compliance with the terms and conditions of the permit, or
- b. If the permittee obtains final approval of a significant modification to the permit to incorporate the change in the permit.

[45CSR§30-5.8.c.]

- 2.11.4. "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

[45CSR§30-2.39]

2.12. Reasonably Anticipated Operating Scenarios

- a. Contemporaneously with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating and to document the change in reports submitted pursuant to the terms of this permit and 45CSR30.
- b. The permit shield shall extend to all terms and conditions under each such operating scenario; and
- c. The terms and conditions of each such alternative scenario shall meet all applicable requirements and the requirements of 45CSR30.

[45CSR§30-5.1.i.]

2.13. Duty to Comply

- 2.13.1. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

[45CSR§30-5.1.f.1.]

2.14. Inspection and Entry

- 2.14.1. The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:
 - a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution Control equipment), practices, or operations regulated or required under the permit;
 - d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

[45CSR§30-5.3.b.]

2.15. Schedule of Compliance

- 2.15.1. For sources subject to a compliance schedule, certified progress reports shall be submitted consistent with the applicable schedule of compliance set forth in this permit and 45CSR§30-4.3.h., but at least every six (6) months, and no greater than once a month, and shall include the following:

- a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
- b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measure adopted.

[45CSR§30-5.3.d.]

2.16. Need to Halt or Reduce Activity not a Defense

- 2.16.1. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

[45CSR§30-5.1.f.2.]

2.17. Emergency

- 2.17.1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

[45CSR§30-5.7.a.]

- 2.17.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of 45CSR§30-5.7.c. are met.

[45CSR§30-5.7.b.]

- 2.17.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The permitted facility was at the time being properly operated;
- c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- d. Subject to the requirements of 45CSR§30-5.1.c.3.C.1, the permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice, report, and variance request fulfills the requirement of 45CSR§30-5.1.c.3.B. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

[45CSR§30-5.7.c.]

- 2.17.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

[45CSR§30-5.7.d.]

- 2.17.5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

[45CSR§30-5.7.e.]

2.18. Federally-Enforceable Requirements

- 2.18.1. All terms and conditions in this permit, including any provisions designed to limit a source's potential to emit and excepting those provisions that are specifically designated in the permit as "State-enforceable only", are enforceable by the Secretary, USEPA, and citizens under the Clean Air Act.

[45CSR§30-5.2.a.]

- 2.18.2. Those provisions specifically designated in the permit as "State-enforceable only" shall become "Federally-enforceable" requirements upon SIP approval by the USEPA.

2.19. Duty to Provide Information

- 2.19.1. The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records required to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

[45CSR§30-5.1.f.5.]

2.20. Duty to Supplement and Correct Information

- 2.20.1. Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

[45CSR§30-4.2.]

2.21. Permit Shield

- 2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and are specifically identified in this permit or the Secretary has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.

[45CSR§30-5.6.a.]

- 2.21.2. Nothing in this permit shall alter or affect the following:

- a. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; or

- b. The applicable requirements of the Code of West Virginia and Title IV of the Clean Air Act (Acid Deposition Control), consistent with § 408 (a) of the Clean Air Act.
- c. The authority of the Administrator of U.S. EPA to require information under § 114 of the Clean Air Act or to issue emergency orders under § 303 of the Clean Air Act.

[45CSR§30-5.6.c.]

2.22. Credible Evidence

- 2.22.1. Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding.

[45CSR§30-5.3.e.3.B. and 45CSR38]

2.23. Severability

- 2.23.1. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid by a court of competent jurisdiction, the remaining permit terms and conditions or their application to other circumstances shall remain in full force and effect.

[45CSR§30-5.1.e.]

2.24. Property Rights

- 2.24.1. This permit does not convey any property rights of any sort or any exclusive privilege.

[45CSR§30-5.1.f.4]

2.25. Acid Deposition Control

- 2.25.1. Emissions shall not exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act (Acid Deposition Control) or rules of the Secretary promulgated thereunder.

- a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid deposition control program, provided that such increases do not require a permit revision under any other applicable requirement.
- b. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement.
- c. Any such allowance shall be accounted for according to the procedures established in rules promulgated under Title IV of the Clean Air Act.

[45CSR§30-5.1.d.]

- 2.25.2. Where applicable requirements of the Clean Air Act are more stringent than any applicable requirement of regulations promulgated under Title IV of the Clean Air Act (Acid Deposition Control), both provisions shall be incorporated into the permit and shall be enforceable by the Secretary and U. S. EPA.

[45CSR§30-5.1.a.2.]

3.0 Facility-Wide Requirements

3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40 C.F.R. §61.145(b) and 45CSR15]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.
[45CSR§11-5.2]
- 3.1.6. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality.
[W.Va. Code § 22-5-4(a)(14)]
- 3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.

- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.

[40 C.F.R. 82, Subpart F]

- 3.1.8. **Risk Management Plan.** Should this stationary source, as defined in 40 C.F.R. § 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. § 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71.

[40 C.F.R. 68]

3.2. Monitoring Requirements

- 3.2.1. None.

3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:
 - a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable.
 - b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit.
 - c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.

[WV Code § 22-5-4(a)(15) and 45CSR13]

3.4. Recordkeeping Requirements

- 3.4.1. **Monitoring information.** The permittee shall keep records of monitoring information that include the following:
- a. The date, place as defined in this permit and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of the analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.

[45CSR§30-5.1.c.2.A.; 45CSR13, R13-1761, 4.4.1]

- 3.4.2. **Retention of records.** The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Where appropriate, records may be maintained in computerized form in lieu of the above records.

[45CSR§30-5.1.c.2.B.]

- 3.4.3. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.

[45CSR§30-5.1.c. State-Enforceable only.]

3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

[45CSR§§30-4.4. and 5.1.c.3.D.]

- 3.5.2. A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.

[45CSR§30-5.1.c.3.E.]

- 3.5.3. All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, mailed first class or by private carrier with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Phone: 304/926-0475
FAX: 304/926-0478

If to the US EPA:

Associate Director
Office of Enforcement and Permits Review
(3AP12)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

- 3.5.4. **Certified emissions statement.** The permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality.
[45CSR§30-8.]
- 3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification.
[45CSR§30-5.3.e.]
- 3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4.
[45CSR§30-5.1.c.3.A.; 45CSR13, R13-1761, 3.5.6.]
- 3.5.7. **Emergencies.** For reporting emergency situations, refer to Section 2.17 of this permit.
- 3.5.8. **Deviations.**
- a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:
1. Any deviation resulting from an emergency or upset condition, as defined in 45CSR§30-5.7., shall be reported by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation, if the permittee desires to assert the affirmative defense in accordance with 45CSR§30-5.7. A written report of such deviation, which shall include the probable cause of such deviations, and any corrective actions or preventative measures taken, shall be submitted and certified by a responsible official within ten (10) days of the deviation.

2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or telefax. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.
3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.
4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.

[45CSR§30-5.1.c.3.C.]

- b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any corrective actions or preventive measures taken in accordance with any rules of the Secretary.

[45CSR§30-5.1.c.3.B.]

- 3.5.9. **New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.

[45CSR§30-4.3.h.1.B.]

3.6. Compliance Plan

- 3.6.1. None.

3.7. Permit Shield

- 3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.
- 3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.
 - a. 40 C.F.R. 60, Subpart Kb – “Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.” 40 C.F.R. 60, Subpart Kb applies to each storage vessel with a capacity greater than or equal to 75m³ (19,813 gallons) that is used to store volatile organic liquids for which construction, reconstruction, or modification commenced after July 23, 1984. All tanks at the facility were installed after the July 23, 1984 applicability date, but are not subject to the requirements of 40 C.F.R. 60, Subpart Kb because their capacities are less than 75 m³.

4.0 Source-Specific Requirements

4.1. Limitations and Standards

- 4.1.1. The permittee shall operate the following particulate matter control devices and said control devices shall be designed to achieve the removal efficiencies as listed:

Table 4.1.1.: Particulate Matter Control Device Removal Efficiencies

Particulate Sources	Control Device Description and ID No.	Removal Efficiency
Flaking and Screening Dust Control	Baghouse (4313-00-10)	99.9
Dry Dust Control System	Baghouse (4333-00-10)	99.9
Mat Trim System	Baghouse (4345-00-10)	99.9
Rough Trim System	Baghouse (4353-00-10)	99.9
T & G and Finish Saws System	Baghouse (4363-00-10)	99.9
Sander Dust System	Baghouse (4374-00-10)	99.9
Dry Waste Relay System	Baghouse (4397-00-10)	99.9
30 MMBTU/hr Energy Cell (3800-00-10) Idle Run	Multi-Clone (3820-00-10)	80.0
30 MMBTU/hr Energy Cell (3900-00-10) Idle Run	Multi-Clone (3920-00-10)	80.0
175 MMBTU/hr Energy Cell (3800-00-10)	WESP (4110-00-10)	80.0
175 MMBTU/hr Energy Cell (3900-00-10)	WESP (4120-00-10)	80.0

[45CSR13, R13-1761, 4.1.1]

- 4.1.2. Emissions to the air from the permitted facility shall not exceed the following:

Table 4.1.2.: Emission Limits⁽¹⁾

Emission Point	Source	Control Device	Pollutant	Emission Limit	
				Hourly (pph)	Annual (tpy)
1	Flaking and Screening System	Fabric Filter (4313-00-10)	PM ₁₀	0.59	2.58
			VOC	0.01	0.05
3	Dry Flake Area	Fabric Filter (4333-00-10)	PM ₁₀	0.48	2.11
			VOC	0.82	3.57
4	Mat Trim System	Fabric Filter (4345-00-10)	PM ₁₀	0.55	2.41
			VOC	0.82	3.59
5	Rough Trim System	Fabric Filter (4353-00-10)	PM ₁₀	0.57	2.51
			VOC	0.85	3.74
6	Tongue & Groove and Sawing System	Fabric Filter (4363-00-10)	PM ₁₀	0.62	2.70
			VOC	0.92	4.02
7	Sander Dust System	Fabric Filter (4374-00-10)	PM ₁₀	0.40	1.77
			VOC	0.39	1.72
9	Dry Waste System	Fabric Filter (4397-00-10)	PM ₁₀	0.86	3.74
			VOC	1.27	5.58

Emission Point	Source	Control Device	Pollutant	Emission Limit	
				Hourly (pph)	Annual (tpy)
10 ⁽²⁾	Energy Cell No. 1 (3800-00-10) (Idle-Run Mode Only) Auxiliary Burners (3816-00-11) (Idle-Run Mode Only)	Multi-Clone (3820-00-10)	PM ₁₀	6.8	9.5
			SO ₂	1.0	1.4
			CO	6.0	8.4
			VOC	9.1	12.8
			NO _x	8.0	11.2
			Benzene	0.45	0.63
11 ⁽²⁾	Energy Cell No. 2 (3900-00-10) (Idle-Run Mode) Auxiliary Burners (3916-00-11) (Idle-Run Mode)	Multi-Clone (3920-00-10)	Hydrochloric Acid	0.22	0.31
			Lead Compounds	0.01	0.01
			Methylene Chloride	0.07	0.10
			Napthalene	0.43	0.60
			POM	0.43	0.60
			Total HAP	2.71	3.79
21 ⁽³⁾	Energy Cell No. 1 (3800-00-10) Energy Cell No. 2 (3900-00-10) Dryer No. 1 (3130-00-11) Dryer No. 2 (3230-00-11) Dryer No. 3 (3330-00-11) Dryer No. 4 (3430-00-11) OSB Press (4700-00-10) Auxiliary Burners (3816-00-11) Auxiliary Burners (3916-00-11)	Wet ESP No. 1 (4110-00-10)	PM	34.00	N/A ⁽³⁾
			PM ₁₀	34.00	
			SO ₂	12.00	
			CO	40.00	
			VOC	57.71	
			NO _x	86.00	
		Wet ESP No. 2 (4210-00-10)	Acetaldehyde	2.34	
			Acrolein	0.91	
			Formaldehyde	4.45	
			Lead Compounds	0.01	
			Methanol	10.24	
			Phenol	0.00	
			Propionaldehyde	0.98	
			Total HAP	25.93	
21 ⁽⁴⁾	Energy Cell No. 1 (3800-00-10) Energy Cell No. 2 (3900-00-10) Dryer No. 1 (3130-00-11) Dryer No. 2 (3230-00-11) Dryer No. 3 (3330-00-11) Dryer No. 4 (3430-00-11) OSB Press (4700-00-10) Auxiliary Burners (3816-00-11) Auxiliary Burners (3916-00-11)	Wet ESP No. 1 (4110-00-10)	PM	34.00	76.00
			PM ₁₀	34.00	76.00
			SO ₂	12.00	17.00
		Wet ESP No. 2 (4210-00-10)	CO	44.00	226.00
			VOC	16.84	60.49
			NO _x	91.00	226.00
		Regenerative Catalytic/ Thermal Oxidizer Nos.1 and 2 (4440-00-10 and 4460-00-10)	Acetaldehyde	0.73	1.43
			Acrolein	0.28	0.35
			Formaldehyde	4.45	9.63
			Lead Compounds	0.01	0.03
			Methanol	3.21	9.21
			Phenol	0.00	0.00
			Propionaldehyde	0.31	0.24
			Total HAP	11.34	24.66
24	OSB Press (4700-00-10) (Bypass Mode)	N/A	PM ₁₀	2.5	0.48
			CO	9.0	2.95
			VOC	36.0	7.86
			Acetaldehyde	1.94	0.33
			Chlorine	1.14	0.09
			Cumene	12.0	1.10
			Formaldehyde	6.00	1.49
			Methanol	15.5	4.88
			MDI	0.03	0.01
			Phenol	0.52	0.06

Emission Point	Source	Control Device	Pollutant	Emission Limit	
				Hourly (pph)	Annual (tpy)
			Total HAP	37.3	7.96
27	Emergency diesel-fired generator	N/A	PM ₁₀	0.44	0.03
			SO ₂	3.1	0.16
			CO	4.2	0.21
			VOC	0.50	0.03
			NO _x	18.2	0.92
31	Liquid Phenolic Resin Tank No. 1	N/A	VOC	---	0.01
32	Liquid Phenolic Resin Tank No. 2	N/A			
33	Liquid Phenolic Resin Tank No. 3	N/A			
34	Liquid Phenolic Resin Tank No. 4	N/A			
35	MDI Tank No. 1	N/A	VOC	---	---
36	MDI Tank No. 2	N/A			
37	Wax Tank No. 1	N/A	VOC	---	0.01
38	Wax Tank No. 2	N/A			
39	Natural gas fired wax/resin tank heater (8109-00-10)	N/A	PM ₁₀	0.03	0.12
			SO ₂	0.01	0.01
			CO	0.29	1.30
			VOC	0.02	0.11
			NO _x	0.34	1.54
40 & 41	Paint Booth No. 1	Filters	PM ₁₀	0.39	1.71
42 & 43	Paint Booth No. 2	Filters			
44 & 45	Paint Booth No. 3	Filters			
46	Liquid Phenolic Resin Tank No. 5	N/A	VOC	---	0.01
47	Liquid Phenolic Resin Tank No. 6	N/A			

- (1) The VOC emissions from emission points 1-11 are based on estimations using industry averages and not testing data.
- (2) These emission limits are applicable only when the Energy Cells are in “Idle Run Mode” as defined under 4.1.3. They are not applicable during times of SSM.
- (3) These emission limits are applicable only when the mill is operating under the RCDME as outlined under 4.1.3. They are not applicable during times of SSM.
- (4) These emission limits are applicable during all times of “normal operation” and during times of “Energy Cell Only Mode” as defined under 4.1.3. They are not applicable during times of SSM.

Compliance with the hourly PM₁₀ emission limits for emission points 3, 4, 5, 6, 7, 9, 21, 24, 40, 41, 42, 43, 44, and 45 shall demonstrate compliance with the less stringent hourly particulate matter emission limits of 45CSR§7-4.1. Compliance with the hourly PM₁₀ emission limit for emission points 10 and 11 shall demonstrate compliance with the less stringent 45CSR§2-4.1.b hourly particulate matter emission limit. Compliance with the hourly SO₂ emission limit for emission points 10 and 11 shall demonstrate compliance with the less stringent 45CSR§10-3.3.f hourly SO₂ emission limit. **[45CSR13, R13-1761, 4.1.2, 4.1.13, 4.1.14, and 4.1.15; 45CSR§7-4.1; 45CSR§2-4.1.b; 45CSR§10-3.3.f; 45CSR§30-12.7]**

4.1.3. For the purposes of this permit, the following operating scenarios are defined:

- a. “Normal operation” shall mean those times when the Energy Cells are in operation, material is being dried in the dryers, gases are vented through the operating WESPs and RCO/RTOs, and emitted from Emission Point 21.
- b. “Idle Run Mode” shall be defined as those times when the Energy Cells are operating, no material is being dried in the dryers, gases are vented through the operating Multi-clones, and emitted from Emission Points 10 and 11.

- c. “Energy Cell Only Mode” shall be defined as those times when the Energy Cells are operating, no material is being dried in the dryers, gases are vented through the operating WESPs, and emitted from Emission Point 21.
 - d. “RCDME” shall be defined as those times when the Energy Cells are operating, material is being dried in the dryers, gases are vented through the operating WESPs, and emitted from Emission Point 21.
[45CSR13, R13-1761, 4.1.3]
- 4.1.4. Operation of the Energy Cells (ID No. 3800-00-10 and ID No. 3900-00-10) shall be in accordance with the following requirements:
- a. The permitted facility shall burn only hogged wood as the primary fuel or natural gas as the backup fuel to fire the Energy Cells (ID No. 3800-00-10 and ID No. 3900-00-10). Alternative fuels may be used only after receiving prior written approval from the Director.
 - b. During Idle Run Mode, Energy Cells shall be limited to a combined total of 2,800 hours of operation on a consecutive 12-month period.
 - c. During Idle Run Mode, the combined heat input rate to Energy Cells (ID No. 3800-00-10 and ID No. 3900-00-10) shall be limited to 40 MMBTU/hr. Additionally, the maximum heat input rate to each individual energy cell shall be less than 30 MMBTU/hr.
[45CSR13, R13-1761, 4.1.4]
- 4.1.5. The auxiliary natural gas burners, designated as 3816-00-11 and 3916-00-11, (associated with the Energy Cells), shall not exceed a maximum design heat input of 29 MMBTU/hr per unit.
[45CSR13, R13-1761, 4.1.5]
- 4.1.6. Pursuant to 40 CFR 63, Subpart DDDD, operation of the facility under the Routine Control Device Maintenance Exemption (RCDME) shall be according to the following requirements:
- a. For each process unit, a maximum of 3% of its actual annual operating hours may be during periods when its controlling RTO/RCO is offline for routine maintenance. This exemption applies to each dryer (1-4) and the press. Additionally, since the press is controlled by both RTOs/RCOs, any and all time it operates while either RTO is offline for routine maintenance shall be counted fully towards its 3% limit.
 - b. In order to minimize emissions, the facility shall not process any pine during any time when either of the RTOs/RCOs are offline for routine maintenance and the press and/or any of the dryers (1-4) which are controlled by the offline RTO/RCO continues to operate.
 - c. As a minimization strategy, the facility shall to the greatest extent practically possible perform routine maintenance during periods when the press and dryers are already offline (not producing product) for maintenance or other reasons.
 - d. As a minimization strategy, the facility shall to the greatest extent practically possible take only one RTO/RCO offline at a time for routine maintenance, continuing the normal operation of the other RTO/RCO so long as the process units which it controls are operating.

- e. The permittee shall follow the Standard Operating Procedure submitted as Attachment T in permit application R13-1761G to prevent pine from being processed during periods of operation under the RCDME.

[45CSR13, R13-1761, 4.1.6]

- 4.1.7. The permitted facility shall route the press vent exhaust fumes into the Energy Cells and Dryers during normal operations. At times when the press is processing wood materials, the facility will be allowed to exhaust press vent fumes directly to the atmosphere through a press Bypass Stack (emission point 24) for a maximum of 500 hours per consecutive 12 month period. When the presses are not processing wood, the press vent fumes may be exhausted directly to the atmosphere through the press Bypass Stack for an unrestricted amount of time.

With the exception of times meeting the facility's routine control device maintenance exemption (RCDME) criteria, the permittee shall not bypass control equipment at any time, except as allowed under "Startup, Shutdown, and/or Malfunction" (SSM) events as defined within 40 CFR 63.2. During any SSM event the permittee shall have the general duty to reduce emissions from the affected source to the greatest extent which is consistent with safety and good air pollution control practices. Therefore, the permittee shall maintain a startup, shutdown, and malfunction plan in accordance with 40 CFR 63.6(e)(3). Each of these events shall be reported in accordance with 40 CFR §63.10(d)(5) and thus 4.5.3 of this permit.

[45CSR13, R13-1761, 4.1.7, [40 C.F.R. §63.2290](#)]

- 4.1.8. The auxiliary natural gas fired burners (for Dryers No. 1 through No. 4), designated as 3130-00-11, 3230-00-11, 3330-00-11, and 3430-00-11, shall not exceed a maximum design heat input of 55 MMBTU/hr per unit.

[45CSR13, R13-1761, 4.1.8]

- 4.1.9. The permitted facility shall not exceed the following annual throughput of materials (based on a rolling twelve (12) month period):

- 4.1.9.1. Phenol formaldehyde resin (liquid or powder) shall not exceed 31,697,525 pounds measured on a solids basis,

- 4.1.9.2. Polymeric diphenylmethane diisocyanate (MDI) shall not exceed 15,457,049 pounds, and

- 4.1.9.3. Wax shall not exceed 14,155,990 pounds.

[45CSR13, R13-1761, 4.1.9]

- 4.1.10. The natural gas fired heater (Wax/Resin Tank Heater), designated as 8109-00-10, shall not exceed a maximum design heat input of 3.5 MMBTU/hr and shall not consume in excess of 30.7 million cubic feet of natural gas on an annual basis. **[45CSR13, R13-1761, 4.1.10]**

- 4.1.11. The permittee shall operate and maintain filter systems for the purpose of controlling particulate matter released from Paint Booths No. 1, 2, and 3. **[45CSR13, R13-1761, 4.1.11]**

- 4.1.12. All access roads used in conjunction with the operations permitted herein shall be paved. **[45CSR13, R13-1761, 4.1.12]**

- 4.1.13. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average. (10, 11, 39) **[45CSR13, R13-1761, 4.1.13; 45CSR§2-3.1]**
- 4.1.14. No person shall cause, suffer, allow or permit any source of fugitive particulate matter to operate that is not equipped with a fugitive particulate matter control system. This system shall be operated and maintained in such a manner as to minimize the emission of fugitive particulate matter. Sources of fugitive particulate matter associated with fuel burning units shall include, but not be limited to, the following:
- 4.1.15.1. Stockpiling of ash or fuel either in the open or in enclosures such as silos;
- 4.1.15.2. Transport of ash in vehicles or on conveying systems, to include spillage, tracking or blowing of particulate matter from or by such vehicles or equipment; and
- 4.1.15.3. Ash or fuel handling systems and ash disposal areas.
- (10, 11) **[45CSR13, R13-1761, 4.1.13; 45CSR§2-5.1]**
- 4.1.15. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity, except as noted in 4.1.16. (1, 3, 4, 5, 6, 21, 24, 40, 41, 42, 43, 44, and 45) **[45CSR13, R13-1761, 4.1.14; 45CSR§7-3.1]**
- 4.1.16. The provisions of 4.1.15 shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period. (1, 3, 4, 5, 6, 21, 24, 40, 41, 42, 43, 44, and 45) **[45CSR13, R13-1761, 4.1.14; 45CSR§7-3.2]**
- 4.1.17. No person shall cause, suffer, allow or permit visible emissions from any storage structure(s) associated with any manufacturing process(es) that pursuant to 4.1.22 is required to have a full enclosure and be equipped with a particulate matter control device. (7, 9) **[45CSR13, R13-1761, 4.1.14; 45CSR§7-3.7]**
- 4.1.18. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A of 45CSR7.

Emission Point	45CSR7 Hourly Particulate Emission Limit pph
1	0.12

[45CSR13, R13-1761, 4.1.14; 45CSR§7-4.1.]

- 4.1.19. Mineral acids shall not be released from any type source operation or duplicate source operation or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity given in Table 45-7B of 45CSR7.
Hydrochloric acid mist and/or vapor for source operations installed after July 1, 1970: 210 mg/m³
(21) **[45CSR13, R13-1761, 4.1.14; 45CSR§7-4.2 and Table 45-7B]**

- 4.1.20 No person shall circumvent the provisions of 45CSR7 by adding additional gas to any exhaust or group of exhausts for the purpose of reducing the stack gas concentration.
[45CSR13, R13-1761, 4.1.14; 45CSR§7-4.3]
- 4.1.21. Any stack serving any process source operation or air pollution control equipment on any process source operation shall contain flow straightening devices or a vertical run of sufficient length to establish flow patterns consistent with acceptable stack sampling procedures.
[45CSR13, R13-1761, 4.1.14; 45CSR§7-4.12]
- 4.1.22. No person shall cause, suffer, allow or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonable achievable.
[45CSR13, R13-1761, 4.1.14; 45CSR§7-5.1]
- 4.1.23. The owner or operator of a plant shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment.
[45CSR13, R13-1761, 4.1.14; 45CSR§7-5.2]
- 4.1.24. Due to unavoidable malfunction of equipment, emissions exceeding those set forth in 45CSR7 may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the malfunction. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director.
[45CSR13, R13-1761, 4.1.14; 45CSR§7-9.1]
- 4.1.25. No person shall cause, suffer, allow or permit the emission into the open air from any source operation an in-stack sulfur dioxide concentration exceeding 2,000 parts per million by volume from existing source operations. (21) **[45CSR13, R13-1761E, 4.1.15; 45CSR§10-4.1]**
- 4.1.26. The owner or operator of a plant that discharges or may discharge a toxic air pollutant into the open air in excess of the amount shown in Table A of 45CSR27 shall employ BAT at all chemical processing units emitting the toxic air pollutant: Provided, that any source or equipment specially subject to a federal regulation or standard shall not be required to comply with provisions more stringent than such regulation or standard. (10, 11, 21, 24) **[45CSR13, R13-1761, 4.1.16; 45CSR§27-3.1]**
- 4.1.27. Except for periods when the mill is operating under the RCDME or during times of SSM, the permittee shall limit emissions of total HAP from emission point 21, measured as THC (as carbon) to 20 ppmvd. **[45CSR13, R13-1761, 4.1.17; 45CSR34; 40 C.F.R. §63.2240(b) and 40 C.F.R. 63, Subpart DDDD, Table 1B]**
- 4.1.28. The permittee shall meet the following RTO/RCO operating requirements:
- a. For a thermal oxidizer, maintain the 3-hour block average firebox temperature at or above 1524.2 °F for oxidizer A and 1520 °F for oxidizer B. ~~the minimum temperature established during the~~

~~performance test or maintain the 3-hour block average THC concentration in the thermal oxidizer exhaust below the maximum concentration established during the performance test.~~

- b. For a catalytic oxidizer, maintain the 3-hour block average catalytic oxidizer temperature at or above 550 °F for oxidizer A and 550 °F for oxidizer B. ~~the minimum temperature established during the performance test; AND check the activity level of a representative sample of the catalyst at least every 12 months or maintain the 3-hour block average THC concentration in the catalytic oxidizer exhaust below the maximum concentration established during the performance test.~~

The operating limits summarized above were defined within the permittee's notification of compliance status report dated May 27, 2009 as well as a July 30, 2009 notification of compliance status addendum. Upon submittal of a notification of process change as specified within §63.2280(g)(3) and a subsequent finding of compliance made by the WVDAQ, the operating limits listed above may be revised as allowed under the Federal Regulation.

[45CSR13, R13-1761, 4.1.18; 45CSR34; 40C.F.R. §63.2240(b) and 40 C.F.R. 63, Subpart DDDD, Table 2]

- 4.1.29. The permittee shall develop a written SSM plan according to 40 C.F.R. §63.6(e)(3).
[45CSR13, R13-1761, 4.1.19; 45CSR34; 40 C.F.R. §63.2250(c)]

- 4.1.30. The permittee shall abide by the work practice standards associated with Group 1 miscellaneous coating operations by using non-HAP coatings as defined in 40CFR§63.2292.
[45CSR34; 40 C.F.R. §63.2241 and 40 C.F.R. 63, Subpart DDDD, Table 3]

~~The permittee shall submit a complete application for significant modification to the Title V permit to incorporate the specific requirements of 40 C.F.R. 63, Subpart DDDD. The Title V modification application shall be submitted by May 29, 2009, which corresponds with the maximum time allowed for NOCS submittal per 40 C.F.R. 63, Subpart DDDD.~~

~~If requested, this deadline may be changed upon written approval by the Director. The permittee shall request the change in writing at least 30 days prior to the application due date. Additionally, these dates may be subject to change if the permittee is granted an extension pursuant to the provisions of 40 C.F.R. 63, or the compliance date is amended by USEPA or subsequent final Court action.~~
[45CSR§30-6.5.b]

- 4.1.31. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.1 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR13, R13-1761, 4.1.20; 45CSR§13-5.11]

4.2. Monitoring Requirements

- 4.2.1. For the purpose of determining compliance with the operating limits set forth in Section 4.1.3.a, of this permit, the permittee shall monitor the number of hours per month the Energy Cells (ID No. 3800-00-10 and ID No. 3900-00-10) operate in the idle run mode.
[45CSR13, R13-1761, 4.2.1]

- 4.2.2. For the purpose of determining compliance with the operating limits set forth in Section 4.1.7 of this permit, the permittee shall monitor the number of hours per month the press vent fumes are being exhausted directly to the atmosphere through the press Bypass Stack (Emission Point 24).

[45CSR13, R13-1761, 4.2.2]

- 4.2.3. For the purpose of determining compliance with the throughput limits set forth in Section 4.1.9 of this permit, the permittee shall monitor the monthly throughput of phenol formaldehyde resin (liquid or powder) as measured on a solids basis, polymeric diphenylmethane diisocyanate (MDI), and wax.

[45CSR13, R13-1761, 4.2.3]

- 4.2.4. The permittee shall meet all applicable RTO/RCO monitoring requirements pursuant to 40 C.F.R. 63, Subpart DDDD. This shall include continuous monitoring of the RTO/RCO operating temperatures, which shall be tabulated as a 3-hour block average consisting of evenly spaced readings, recorded in the previous 3 operating hours. For purpose of calculating data averages, you must not use data recorded during the events listed within 40 CFR §63.2270(b) and (c). Some of these events include malfunctions, associated repairs, out-of-control periods, required quality assurance or control activities, data recorded during periods of startup, shutdown, and malfunction; or data recorded during periods of control device downtime covered in any approved routine control device maintenance exemption.

Additionally in accordance with 40 CFR 63§2270(f), to calculate the data averages for each 3-hour averaging period, you must have at least 75 percent of the required recorded readings for that period using only readings that are based on valid data.

[45CSR13, R13-1761, 4.2.4., [40C.F.R. §63.2270](#)]

- 4.2.5. To demonstrate compliance with the 45CSR§2-3.1 opacity limits specified in 4.1.13 for emissions points 10, 11, and 39, the permittee shall conduct semimonthly (every two weeks) visible emission checks. These checks shall be conducted during periods of normal facility operation for a sufficient time interval to determine if the unit has visible emissions using the procedures outlined in 40 C.F.R. 60, Appendix A, Method 22. If sources of visible emissions are identified during the checks, or at any other time, the permittee shall conduct a 40 C.F.R. 60, Appendix A, Method 9 evaluation within twenty-four (24) hours. A Method 9 evaluation shall not be required if the visible emission condition is corrected in a timely manner and the units are operated at normal operating conditions.

The semimonthly visible emission checks shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40 C.F.R. 60, Appendix A, Method 22 or from the lecture portion of the 40 C.F.R. 60, Appendix A, Method 9 certification course.

[45CSR§30-5.1.c]

- 4.2.6. To demonstrate compliance with the 45CSR§§7-3.1, 3.2, and 3.7 opacity limits specified in 4.1.15, 4.1.16, and 4.1.17 for emissions points 1, 3, 4, 5, 6, 7, 9, 21, 24, 40, 41, 42, 43, 44, and 45, the permittee shall conduct semimonthly (every two weeks) visible emission checks. These checks shall be conducted during periods of normal facility operation for a sufficient time interval to determine if the unit has visible emissions using the procedures outlined in 40 C.F.R. 60, Appendix A, Method 22. If sources of visible emissions are identified during the checks, or at any other time, the permittee shall conduct a 45CSR7A evaluation within twenty-four

(24) hours. A 45CSR7A evaluation shall not be required if the visible emission condition is corrected in a timely manner and the units are operated at normal operating conditions.

The semimonthly visible emission checks shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40 C.F.R. 60, Appendix A, Method 22 or from the lecture portion of the 40 C.F.R. 60, Appendix A, Method 9 certification course.

[45CSR§30-5.1.c]

- 4.2.7. For Wet ESP No. 1 (4110-00-10), Wet ESP No. 2 (4120-00-10), and the Dry Waste System Baghouse (4397-00-01), the permittee shall conduct visual inspections of the ductwork and the control devices. These visual inspections shall be conducted by personnel trained annually on the proper methods to complete these inspections and a copy of the current training manual shall be maintained on site and available for review by the Director or his duly authorized representative upon request. External inspections of the ductwork and control devices shall be conducted monthly and internal inspections shall be conducted every 12 months. Any leaks or structural deficiencies discovered during these inspections, or at any other time, are indicators that the equipment is not in proper working order. Leaks or structural deficiencies shall be repaired as soon as practicable, but no later than one week within the date of discovery, unless granted an extension by the Director.

[45CSR§30-5.1.c; 40 C.F.R. §§64.6(c), 64.7(c), and 64.7(d)]

- 4.2.8. The permittee shall continuously monitor the voltage of Wet ESP No. 1 (4110-00-10) and Wet ESP No. 2 (4120-00-10). The voltage on each Wet ESP shall be measured with a voltmeter with a minimum accuracy of ± 1 kV. At least semi-annually, each voltmeter shall be calibrated to confirm that it has a reading of zero when the Wet ESP is not operating. During normal operation, each Wet ESP shall have at least 2 fields in service and the voltage shall be maintained at or above 10 kV. If the voltage falls below 10 kV for 30 seconds, an alarm will sound and corrective action shall be taken to return the voltage to a value at or above 10 kV.

[45CSR§30-5.1.c; 40 C.F.R. §§64.6(c), 64.7(c), and 64.7(d)]

- 4.2.9. The permittee shall monitor the pressure drop across the Dry Waste System Baghouse (4397-00-01) on a daily basis. The pressure drop shall be measured using a differential pressure gauge with a minimum accuracy of ± 0.25 inches of H₂O. Pressure taps shall be located at the inlet and outlet to the baghouse. At least annually, the pressure gauge and the reader shall be calibrated according to manufacturer's recommendations. When the pressure drop is greater than 5 inches of H₂O or less than 0.5 inches of H₂O, the permittee shall conduct an inspection of the baghouse and corrective action shall be taken to return the pressure drop to an operating range of less than 5 inches and greater than 0.5 inches of H₂O.

[45CSR§30-5.1.c; 40 C.F.R. §§64.6(c), 64.7(c), and 64.7(d)]

4.3. Testing Requirements

- 4.3.1. Within 180 days after October 1, 2008, and at such times thereafter as may be required by the Secretary, the permittee shall conduct or have conducted performance test(s) on Emission Point 21 to determine compliance with the specified emission limits under 4.1.2. The test shall be performed according to the following conditions:

- a. The permittee shall test the pollutants specified in the following table and use the test methods listed unless granted approval in writing by the Director to use an alternative test method in a protocol submitted pursuant to 3.3.1.c.

Table 4.3.1.(a): Emission Point 21 Pollutants/Test Methods

Pollutant	Test Method ⁽¹⁾
CO	Method 10
NO _x	Method 20
PM ₁₀	Method 5 and 202
VOCs	Other Test Method 26 ⁽²⁾
Formaldehyde	Method 0011

⁽¹⁾ All test methods refer to those given under 40 C.F.R. 60, Appendix A

⁽²⁾ VOC Measurement for the Plywood Industry. Compliance with any standard under 40 C.F.R. 63, Subpart DDDD should be determined using the test method required in 40 C.F.R. 63, Subpart DDDD.

- b. The test shall be in accordance with 3.3.1.
[45CSR13, R13-1761, 4.3.1; CO-R34-E-2008-13]
- 4.3.2. The permittee shall meet all applicable RTO/RCO testing requirements pursuant to 40 C.F.R. 63, Subpart DDDD. [This shall include annual catalyst activity testing in accordance with 40 CFR 63 Table 2 Row \(2\) and Table 7 Row \(4\) as well as any additional confirmatory testing determined necessary by the Director.](#)
[45CSR13, R13-1761, 4.3.2., 40 C.F.R. 63, Table 7 row (4), [45CSR§30-5.1.c.](#)]
- 4.3.3. At such reasonable times as the Director may designate, the owner or operator of any fuel burning unit(s) may be required to conduct or have conducted tests to determine the compliance of such unit(s) with the emission limitations of 45CSR§2-4. Such tests shall be conducted in accordance with the appropriate method set forth in the Appendix to 45CSR2 or other equivalent EPA approved method approved by the Director. The Director or his duly authorized representative, may at his option witness or conduct such tests. Should the Director exercise his option to conduct such tests, the operator will provide all necessary sampling connections and sampling ports located in such manner as the Director may require, power for test equipment, and the required safety equipment such as scaffolding, railings and ladders to comply with generally accepted good safety practices. Sufficient information on temperatures, velocities, pressures, weights and dimensional values shall be reported to the Director, with such necessary commentary as he may require to allow an accurate evaluation of the reported test results and the conditions under which they were obtained.
[45CSR13, R13-1761, 4.1.13; 45CSR§§2-8.1.b and 8.1.b.1]
- 4.3.4. At such reasonable times as the Director may designate, the operator of any manufacturing process source operation may be required to conduct or have conducted stack tests to determine the particulate matter loading in exhaust gases. Such tests shall be conducted in such manner as the Director may specify and be filed on forms and in a manner acceptable to the Director. The Director, or his duly authorized representative, may at his option witness or conduct such stack tests. Should the Director exercise his option to conduct such tests, the operator will provide all the necessary sampling connections and sampling ports to be located in such manner as the Director may require, power for test equipment and the required safety equipment such as scaffolding, railings and ladders to comply with generally accepted good safety practices.
[45CSR13, R13-1761, 4.1.14; 45CSR§7-8.1]
- 4.3.5. The Director, or his duly authorized representative, may conduct such other tests as he or she may deem necessary to evaluate air pollution emissions.
[45CSR13, R13-1761, 4.1.14; 45CSR§7-8.2]
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- 4.3.6. In order to confirm compliance with 40 C.F.R. 63, subpart DDDD and permitted VOC limits, the permittee shall conduct confirmatory testing of emission point ID 21 at least once per Title V permit term in order to correlate catalyst activity levels and operating temperatures with THC (as carbon) concentrations and WPP1 VOC emissions.
[45CSR§30-5.1.c.1.B. and 45CSR§30-5.3]

4.4. Recordkeeping Requirements

- 4.4.1. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.1, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.
[45CSR13, R13-1761, 4.4.2]
- 4.4.2. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.1, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:
- a. The equipment involved.
 - b. Steps taken to minimize emissions during the event.
 - c. The duration of the event.
 - d. The estimated increase in emissions during the event.
- For each such case associated with an equipment malfunction, the additional information shall also be recorded:
- e. The cause of the malfunction.
 - f. Steps taken to correct the malfunction.
 - g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.
- [45CSR13, R13-1761, 4.4.3]**
- 4.4.3. For the purpose of demonstrating compliance with the requirements set forth in Section 4.1.3.a. of this permit, the permittee shall maintain a monthly record of the number of hours per month the Energy Cells (ID No. 3800-00-10 and ID No. 3900-00-10) operate in the idle run mode.
[45CSR13, R13-1761, 4.4.4]
- 4.4.4. For the purpose of demonstrating compliance with the requirements set forth in Section 4.1.7 of this permit, the permittee shall maintain a monthly record of the number of hours per month the press vent fumes are being exhausted directly to the atmosphere through the press Bypass Stack (Emission Point 24).
[45CSR13, R13-1761, 4.4.5]

- 4.4.5. For the purpose of demonstrating compliance with the record keeping requirements set forth in Section 4.1.9 of this permit, the permittee shall maintain a record of the monthly throughput of phenol formaldehyde resin, polymeric diphenylmethane diisocyanate (MDI), and wax resins. **[45CSR13, R13-1761, 4.4.6]**
- 4.4.6. The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day. The permittee shall also maintain records of the date and time of start-up and shutdown; and a quarterly ash and BTU analysis of the wood combusted. *(10, 11)*
The 40 C.F.R. §60.48c(g) requirement to maintain records of the quantity of each fuel combusted on a daily basis was streamlined with the less stringent 45CSR§2A-7.1.a.1 requirement to maintain records of the quantity of natural gas consumed on a monthly bases.
[45CSR13, R13-1761, 4.4.9 and 4.1.14; 40 C.F.R. §60.48c(g); 45CSR16; 45CSR§2-8.3.c; 45CSR§§2A-7.1.a.1 and 7.1.a.3]
- 4.4.7. The permittee shall meet all applicable RTO/RCO record-keeping requirements pursuant to 40 C.F.R. 63, Subpart DDDD. These records shall include the following:
- a. Maintaining records of continuous firebox/combustion chamber temperatures on each of the oxidizers.
- b. Catalytic activity measurements shall be recorded annually and maintained in accordance with 40 C.F.R. §63.2282(e)
- c. Maintain records of all Group 1 coatings to assure the use of non-HAP coatings.
[45CSR13, R13-1761, 4.4.10, 45CSR34, 40 C.F.R. 63, Subpart DDDD, Tables 7 and 8.]
- 4.4.8. The permittee shall maintain records of all monitoring data required by Sections 4.2.5 and 4.2.6 documenting the date and time of each visible emission check, the emission point or equipment identification number, the name or means of identification of the responsible observer, the results of the check, and, if necessary, all corrective actions taken. Should a visible emission observation be required to be performed per the requirements specified in 40 C.F.R. 60, Appendix A, Method 9 or 45CSR7A, the data records of each observation shall be maintained per the requirements of 40 C.F.R. 60, Appendix A, Method 9 or 45CSR7A. For an emission unit out of service during the normal monthly evaluation, the record of observation may note “out of service” (OOS) or equivalent. **[45CSR§30-5.1.c]**
- 4.4.9. The permittee shall monitor all fugitive particulate emission sources as required by 4.1.14 and 4.1.22 to ensure that a system to minimize fugitive emissions has been installed or implemented. Records shall be maintained stating the types of fugitive particulate capture and/or suppression systems used, the times these systems were inoperable, and the corrective actions taken to repair these systems. **[45CSR§30-5.1.c]**
- 4.4.10. The permittee shall maintain records indicating the use of any dust suppressants or any other suitable dust control measures as required by 4.1.23 applied at the facility. **[45CSR§30-5.1.c]**
- 4.4.11. The permittee shall maintain records of all monitoring data required by Section 4.2.7 documenting the date and time of each visual inspection, the emission point or equipment identification number, the name or means of identification of the responsible observer, the results of the inspection, and if necessary, all corrective actions taken. For any maintenance conducted on the control devices, records shall be maintained in accordance with 4.4.1. **[45CSR§30-5.1.c; 40 C.F.R. §64.9(b)]**

- 4.4.12. The voltage measured across Wet ESP No. 1 (4110-00-10) and Wet ESP No. 2 (4120-00-10) shall be recorded as a 6-minute average and records shall be maintained in accordance with 3.4.1. In addition to records of voltage, the permittee shall document and maintain records of all periods during normal operation (non-SSM) when the voltage is less than 10 kV for more than 30 seconds and any corrective actions taken during these periods. Maintenance and malfunction records for Wet ESP No. 1 and Wet ESP No. 2 shall be maintained in accordance with 4.4.1 and 4.4.2. **[45CSR§30-5.1.c; 40 C.F.R. §64.9(b)]**
- 4.4.13. The pressure drop across the Dry Waste System Baghouse (4397-00-10) shall be recorded daily. For any excursions when the pressure drop is greater than 5 inches of H₂O or less than 0.5 inches of H₂O, the permittee shall maintain records of the date and length of time of the occurrence and of the corrective actions taken. Maintenance and malfunction records for the Dry Waste System Baghouse shall be maintained in accordance with 4.4.1 and 4.4.2. **[45CSR§30-5.1.c; 40 C.F.R. §64.9(b)]**
- 4.4.14. For Compliance Assurance Monitoring (CAM), the owner or operator shall comply with the recordkeeping requirements of permit conditions 3.4.1 and 3.4.2. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 C.F.R. §64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 C.F.R. 64 (such as data used to document the adequacy of monitoring, or records of monitoring, maintenance, or corrective actions). (*Wet ESP No. 1 {4110-00-10}, Wet ESP No. 2 {4120-00-10}, and Dry Waste System Baghouse {4397-00-10}*) **[40 C.F.R. §64.9(b)]**
- 4.4.15. For the purpose of demonstrating compliance with the annual fuel usage limits set forth in Section 4.1.10 for the natural gas fired wax/resin tank heater (8109-00-10), the permittee shall maintain records of the amount of natural gas used on a twelve month rolling total basis. **[45CSR§30-5.1.c]**
- 4.4.16. For the purpose of determining compliance with 4.1.6.a., the permittee shall keep a daily record of any start-up, any shut-down, total hours operated and hours operated while the unit's controlling RTO/RCO is offline for routine maintenance. And, as regards the RTOs/RCOs, the permittee shall keep daily records of any start-up, any shut-down, total hours operated and total hours off-line for routine maintenance. **[45CSR13, R13-1761, 4.4.7]**
- 4.4.17. For the purpose of determining compliance with 4.1.6.b., the permittee shall keep records which indicate how much, if any, pine is processed during any period of routine RTO/RCO maintenance. **[45CSR13, R13-1761, 4.4.8]**

4.5. Reporting Requirements

- 4.5.1. For CAM, monitoring reports shall be submitted to the director and at a minimum shall include and be in accordance with information in permit conditions 3.5.6 and 3.5.8, as applicable. Also, at a minimum, the following information, as applicable, shall be included:
- a. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
 - b. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

- c. A description of the actions taken to implement a QIP during the reporting period as specified in 40 C.F.R. §64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

(Wet ESP No. 1 {4110-00-10}, Wet ESP No. 2 {4120-00-10}, and Dry Waste System Baghouse {4397-00-10})
[40 C.F.R. §64.9(a)]

- 4.5.2. The permittee shall meet all applicable ~~RTO/RCO~~ reporting requirements pursuant to 40 C.F.R. 63, Subpart – DDDD, Table 9 and Table 10. This includes semiannual compliance reports, which contain the information described within 40 CFR §63.2281(c)-(f). The semiannual reports may coincide with title V semiannual reporting in accordance with 40 CFR §63.2281(b)(5) and (g) where applicable.

[45CSR13, R13-1761, 4.5.1., 45CSR34, 40 C.F.R. §63.2281(b)]

- 4.5.3. The permittee shall submit all startup, shutdown, and malfunction (SSM) notifications and semiannual reports in accordance with 40 CFR §63.6(e)(3) and §63.10(d)(5).

[45CSR34, 40 C.F.R. §63.2290]

4.6. Compliance Plan

- 4.6.1. None.